

In light of the concerns raised by Mr. Spragens regarding sufficiency of service, Plaintiff asks this Court to grant Plaintiff an additional 90 days to effect service on Defendant Keefer so that Plaintiff may remove any deficiencies of service.

Respectfully Submitted,

/s/ James W. Price, Jr.
James W. Price, Jr., #3538
Attorney for Plaintiff
Price, Hill, Kolarich, & Moore
214 2nd Avenue North, Suite 205
Nashville, TN 37201
(615) 244-5772

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on this the 21st day of September, 2022, via the Court's electronic filing system on the following:

Phillip G. Young, Jr.
Thompson Burton PLLC
1801 West End Avenue, Suite 1550
Nashville, TN 37203
phillip@thompsonburton.com

and via United States First Class mail, postage prepaid on the following:

Bretton Keefer
5960 Pumpkintown Lane
Lafayette, TN 37083

Afsoon Hagh
Hagh Law PLC
1906 Glen Echo Road, #150229
Nashville, TN 37215

/s/ James W. Price, Jr.